



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CAITLIN WILLIAMS; JOHN DOES 1- :  
5 and JANE DOES 105,

Plaintiffs,

-against-

L.A. MODELS, INC. and NYC  
MANAGEMENT GROUP, INC. d.b.a  
NEW YORK MODEL  
MANAGEMENT,

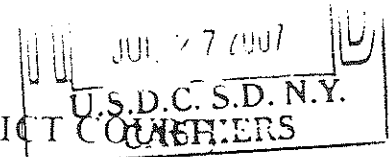
Defendants.  
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07 CV 6778

Case No. \_\_\_\_\_

DEFENDANT L.A. MODELS,  
INC.'S NOTICE OF REMOVAL  
FROM STATE COURT TO  
UNITED STATES DISTRICT  
COURT

TO: THE JUDGES OF THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK, AND TO PLAINTIFFS  
AND DEFENDANTS AND ATTORNEYS OF RECORD HEREIN:



PLEASE TAKE NOTICE, that defendant L.A. MODELS, INC. ("Defendant") hereby removes the above-entitled action (the "Action") from the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York, pursuant to 28 U.S.C. § 1441(b). This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1332, and is one which may be removed to this Court by defendant pursuant to the provisions of 28 U.S.C. § 1441(b), in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interests and costs. See Complaint, paragraphs 62, 66, 69, 83 and 85.

Defendant L.A. MODELS, INC. states that removal is proper for the following reasons:

1. On or about June 20, 2007, Plaintiff filed a Summons and Verified Complaint in the Supreme Court of the State of New York, County of New York. Plaintiff asserts claims resulting from certain alleged acts and/or omissions of the Defendants in connection with a nationwide modeling contests that occurred in 2002. A true copy of the Summons and Verified Complaint is attached to this Notice of Removal as Exhibit "A."

2. In the Complaint, plaintiff alleges that Defendant failed to perform pursuant to an agreement between the parties. Plaintiff has alleged contract and tort claims and seeks actual and punitive damages.

3. This action was previously filed on November 22, 2004 as part of a First Amended Complaint in the case of Bezuska, et al., v. L.A. Models, Inc., et al., United States District Court Case No. 04 Civ. 07703 currently pending before The Honorable Naomi R. Buchwald, Judge of this Court. A true and correct copy of the First Amended Complaint is attached to this Notice of Removal as Exhibit "B."

4. Plaintiff voluntarily dismissed her action in Case No. 04 Civ. 07703 on March 8, 2005. A copy of the Dismissal is attached hereto as Exhibit "C".

5. Defendant L.A. MODELS, INC. was served with the Summons and

Verified Complaint in this Action on July 18, 2007, when the undersigned law firm agreed to accept service on behalf of Defendant, and the undersigned received such authorization to do so. This constitutes all prior process and pleadings in this Action.

6. Defendant L.A. MODELS, INC. is informed and believes that Plaintiff Caitlin Williams was and still is a citizen of the State of Pennsylvania. Defendant L.A. MODELS, INC. is a corporation organized under the laws of the State of California, and having its principal place of business at 7700 Sunset Boulevard, Los Angeles, California 90046; and Defendant NYC Model Management Group, Inc. d/b/a New York Model Management is a corporation organized under the laws of New York, and having its principal place of business at 596 Broadway, New York, New York 10012.

7. Based on the foregoing, the Action is removable from the Supreme Court of the State of New York, County of New York to the United States District Court for the Southern District of New York pursuant to 28 U.S.C. § 1441(b).

8. Defendant's Notice of Removal is timely as the Notice of Removal will be filed within thirty (30) days of the Defendant's Receipt of the Summons and Verified Complaint. See 28 U.S.C. § 1446(b).

9. A copy of this Notice of Removal will be filed with the Supreme Court of the State of New York, County of New York, and will be served on

Plaintiff's counsel pursuant to 28 U.S.C. § 1446(d).

10. Pursuant to Rule 81.1(b) of the local civil rules for the Southern District of New York, the Defendant encloses herein the Summons and Verified Complaint, which comprises a copy of all process and pleadings in the Supreme Court of the State of New York, County of New York.

11. The Defendant reserves the right to amend or supplement this Notice of Removal.

**WHEREFORE**, the Defendant L.A. MODELS, INC. hereby removes to this Court the action now pending against it in the Supreme Court of the State of New York, County of New York, bearing Index No. 108978/07.

Dated: Los Angeles, California.  
July 25, 2007

Respectfully submitted,  
ROPERS, MAJESKI, KOHN & BENTLEY

By: 

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